



CDSS

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DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY  
**DEPARTMENT OF SOCIAL SERVICES**  
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ARNOLD SCHWARZENEGGER  
GOVERNOR

August 31, 2009

Ms. Carol J. Huchingson, Director  
Lake County Department of Social Services  
15975 Anderson Ranch Parkway  
Lower Lake, CA 95457

Dear Ms. Huchingson:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided the reviewer from our office during the course of the Civil Rights Compliance Review of October 21-23, 2008. Enclosed is the final report on the review.

There were some compliance issues (deficiencies) identified in the report, which will require the development of a corrective action plan (CAP). Please submit your CAP within sixty days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the attached report.

We will provide a copy of our report to any individual who makes a Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it too, becomes a public document. Per the Governor's Executive Order S-08-09, all compliance reviews (and corresponding CAPs) performed after January 2008 will be posted on the state's Reporting Government Transparency website.

If you need technical assistance in the development of your CAP, please feel free to contact the Civil Rights Bureau at (916) 654-2107 (voice) / (916) 654-2098 (TDD). You may also contact us by e-mail at [crb@dss.ca.gov](mailto:crb@dss.ca.gov).

Sincerely,

RAMÓN S. LOPEZ, Chief  
Civil Rights Bureau  
Human Rights and Community Services Division

Enclosure

c: Ms. Sandra Young, Civil Rights Coordinator

Chris Webb-Curtis, Branch Chief, CDSS Supplemental Nutrition Assistance Program  
M.S. 8-9-32

Mike Papin, CDSS Supplemental Nutrition Assistance Program  
Food Stamps Policy Bureau M.S. 8-9-32

Richard Trujillo, CDSS Supplemental Nutrition Assistance Program  
Food Stamps Policy Bureau M.S. 8-9-32

Paul Gardes, CDSS Supplemental Nutrition Assistance Program  
Food Stamps Policy Bureau M.S. 8-9-32

Thuan Nguyen, Refugee Programs Bureau, M.S. 8-8-46

Joe Torres, Office of Civil Rights  
USDA Food and Nutrition Services  
Supplemental Nutrition Assistance Program (SNAP)  
Western Region

Dominic Pagano, Office of Civil Rights  
USDA Food and Nutrition Services  
Supplemental Nutrition Assistance Program (SNAP)  
Western Region

Hope Rios,  
USDA Food and Nutrition Services,  
Supplemental Nutrition Assistance Program (SNAP)  
Western Region

**CIVIL RIGHTS COMPLIANCE REVIEW REPORT  
FOR  
Lake County Department of Social Services  
Conducted October 21-23, 2008**

**California Department of Social Services  
Human Rights and Community Services Division  
Civil Rights Bureau  
744 P Street, M.S. 8-16-70  
Sacramento, CA 95814  
(916) 654-2107**

**Reviewer**

**Claudia Cabrera**

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## CIVIL RIGHTS COMPLIANCE REVIEW REPORT

### **I. INTRODUCTION**

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the Lake County Department of Social Services with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted October 21-23, 2008. An exit interview was held on October 23, 2008 with the following staff to review the findings:

- Carol Huchingson     Director, Social Services
- Sandra Young        Civil Rights Coordinator
- Sharon Anderson     Director, Arbor Facility
- Ester Gould          Program Manager, CalWORKs/Other Program Assistance
- John Geib             Senior Staff Analyst
- Micki Dolby          Office Services Supervisor
- June Richmond       CalWORKs Supervisor
- Jean Bowers          CalWORKs Supervisor
- Jennifer Fitts        Deputy Director, CalWORKs/Other Program Assistance
- Carlton Barker      Senior Staff Analyst
- Kathy Maes            Deputy Director, Adult and Children Services

The review was conducted in the following locations:

| <b>Name of Facility</b>                   | <b>Address</b>                                 | <b>Programs</b>     | <b>Non-English languages spoken by a substantial number of clients (5% or more)</b> |
|-------------------------------------------|------------------------------------------------|---------------------|-------------------------------------------------------------------------------------|
| Lake County Department of Social Services | 15975 Anderson Ranch Parkway<br>Lower Lake, CA | NAFS, CalWORKs      | Spanish                                                                             |
| Lake County Department of Social Services | 926 S. Forbes Street<br>Lakeport, CA           | Children's Services | None                                                                                |
| Lake County Department of Social Services | 9055 Highway 53<br>Lower Lake, CA              | Employment Services | Spanish                                                                             |
| Lake County Department of Social Services | 16170 C Main Street<br>Lower Lake, CA          | Adult Services      | None                                                                                |

## II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2008-2009 Annual Civil Rights Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

### Interviews Conducted of Public Contact Staff

| <b>Classifications</b>  | <b>Total</b> | <b>Bilingual</b> |
|-------------------------|--------------|------------------|
| Eligibility Workers     | 3            | 2                |
| Employment Workers      | 3            |                  |
| Children Social Workers | 3            |                  |
| Adult Program Workers   | 3            | 1                |
| Receptionist/Screeners  | 3            |                  |
| <b>Total</b>            | <b>15</b>    | <b>3</b>         |

An additional xxx interviews were scheduled but were not conducted due to staff unavailability.

### Program Manager Surveys

|                               |   |
|-------------------------------|---|
| Number of surveys distributed | 5 |
| Number of surveys received    | 5 |

### Reviewed Case Files

|                                                              |                           |
|--------------------------------------------------------------|---------------------------|
| English speakers' case files reviewed                        | 15                        |
| Non-English or limited-English speakers' case files reviewed | 30                        |
| Languages of clients' cases                                  | English, Spanish, Laotian |

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section IX of the report is reserved for a declaration of overall compliance.

### **III. DISSEMINATION OF INFORMATION**

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

#### **A. Findings**

| <b>Access to Services, Information and Outreach</b>                                                          | <b>Yes</b> | <b>No</b> | <b>Some-times</b> | <b>Comments</b>                                                                                                                  |
|--------------------------------------------------------------------------------------------------------------|------------|-----------|-------------------|----------------------------------------------------------------------------------------------------------------------------------|
| Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in? | X          |           |                   | Client applications can be mailed in and staff can also accommodate clients by flexing their office hours on an as-needed basis. |
| Does the county have extended hours to accommodate clients?                                                  | X          |           |                   | Staff can accommodate clients by flexing their office hours on an as-needed basis.                                               |
| Can applicants access services when they cannot go to the office?                                            | X          |           |                   | Clients can access services through the mail or via telephone.                                                                   |

|                                                                                                                                                                             |            |           |                   |                                                                                                                                                                                                                                                                                     |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-----------|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Does the county ensure the awareness of available services for individuals in remote areas?                                                                                 | X          |           |                   | Awareness of available services is made through the Lake County website, on informational posters located in the lobby of community-based agencies, local clinics and hospitals.                                                                                                    |
| <b>Signage, posters, pamphlets</b>                                                                                                                                          | <b>Yes</b> | <b>No</b> | <b>Some-times</b> | <b>Comments</b>                                                                                                                                                                                                                                                                     |
| Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13)?                                                                             | X          |           |                   | Workers give the PUB 13 to clients during the initial application and renewal.                                                                                                                                                                                                      |
| Is the pamphlet distributed and explained to each client at intake and re-certification?                                                                                    | X          |           |                   | Workers explain the PUB 13 to the clients and make sure that the clients understand the information.                                                                                                                                                                                |
| Was the current version of Pub 13 available in English, Spanish, Lao, Vietnamese, Chinese, Hmong, Russian, Korean, Farsi, Arabic, Laotian, Tagalog, Armenian and Cambodian? | X          |           |                   |                                                                                                                                                                                                                                                                                     |
| Was the Pub 13 available in large print, audiocassette and Braille?                                                                                                         |            | X         |                   | The Adult Services office, located at 16170 C Main Street, did not have the PUB 13 available in large print, audio or Braille. Copies of these materials are not kept in the office. If needed, staff will contact the main office, LCDPSS located at 15975 Anderson Ranch Parkway. |



|                                                                                                                                                                                                   |   |   |  |                                                                                                                                                                                                                                                                                                             |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Were the current versions of the required posters present in the lobbies?                                                                                                                         |   | X |  | <p>The Employment Services office, located at 9055 Hwy 53, did not have the current PUB 86, "Everyone is Different but Equal Under the Law." An out dated poster (8/97) was located in an area not visible to the public.</p> <p>All other offices had the current version, 03/07, posted in the lobby.</p> |
| Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?                                                                                   | X |   |  | All workers know the PUB 86 poster is located in the lobby with the Civil Rights Coordinator information.                                                                                                                                                                                                   |
| Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages? | X |   |  | Instructional and directional signs were translated into the threshold language, Spanish.                                                                                                                                                                                                                   |

## B. Corrective Actions

| Informational Element | Corrective Action Required                                                                                                                                                                              |
|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Auxiliary aids        | Lake County shall ensure the availability of large print, Braille, and auditory aids for participants in all of the programs for which CDSS has oversight responsibility.<br>Div. 21-115.4              |
| Posters               | Lake County shall ensure that the most current version of posters on nondiscrimination provided by CDSS and USDA are prominently displayed in all waiting areas and reception rooms.<br>Div. 21-107.211 |

### C. Recommendation

The most recent version for each of the above referenced documents is:

|              |                                                  |       |
|--------------|--------------------------------------------------|-------|
| Pub 13       | "Your Rights under California Welfare Programs"  | 03/07 |
| Pub 86       | "Everyone is Different, but Equal Under the Law" | 03/07 |
| Form AD 475B | "And Justice for All"                            | 12/99 |

Contact your program consultant to receive the most recent versions, or download the Pub 13 from the CRB website [http://www.dss.cahwnet.gov/civilrights/YourRights\\_498.htm](http://www.dss.cahwnet.gov/civilrights/YourRights_498.htm).

### IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

## A. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

**Facility Location:** 15975 Anderson Ranch Parkway, Lower Lake

| Facility Element  | Findings                                                 | Corrective Action                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-------------------|----------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Parking           | No "Unauthorized Parking" sign at parking lot entrance.  | Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17" by 22" min. in size with lettering 1" min. high, stating: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner's expense. Towed vehicles may be reclaimed at _____ or by telephoning _____." (CA T24 1129B.5) p. 133 |
|                   | The words "NO PARKING" not painted in access aisles.     | The words "NO PARKING" shall be painted on the ground in each 5' or 8' loading and unloading access aisle in white letters no smaller than 12". (CA T24 1129B.4.1 & 2) p. 135                                                                                                                                                                                                                                                                                                                                            |
| Exterior entrance | Force to open door at main entrance excessive at 15 lbs. | Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195                                                                                                                                                                                                                                                                                                                                                                                                        |

|                      |                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                 |
|----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Public Pay Telephone | <p>The available public pay telephone does not have a volume control button or hearing aid compatibility.</p> <p><b>**Repeat Finding in 2005 Review</b></p> | <p>At least one in each telephone bank and a minimum of 25% of the total number of public telephones shall be equipped with a volume control and shall be hearing aid compatible. (CA T24 1117B.2.8, ADA 4.1.3.17(b)) p. 253</p> <p>Telephones with volume control shall be hearing aid compatible and identified with a sign. (CA T24 1117B.2.8 &amp; 1117B.5.8.3, ADA 4.1.3.17(b)) p. 253</p> |
| Water fountain       | Drinking fountain spout too high at 38 ½ inches.                                                                                                            | <p>The spout is located within 6" of the front edge and 36" of the floor. The water stream is parallel to the front edge of the fountain. (CA T24 1115B.2.1.5.3, ADA 4.15.2) p. 213</p>                                                                                                                                                                                                         |
| Restroom             | <p><b>Men's Restroom:</b></p> <p>Toilet tissue dispenser too far from front edge of toilet seat at 19 inches.</p>                                           | <p>Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA-ACRM 1115B.9.3) pp. 275, 269</p> <p>Toilet paper dispenser minimum height from floor is 19". (ADA 4.16.6) pp. 275, 269</p>                                                                                                                                                                    |

|  |                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|--|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | <p><b>Woman's Restroom:</b></p> <p>Door signage too low at 56 inches.</p> <p>Force to open restroom door excessive at 7 lbs of pressure.</p> <p>Soap dispenser too high at 44 ½ inches.</p> <p>Mirror base too high at 43 ½ inches.</p> <p>Toilet tissue dispenser too far from front edge of toilet seat at 16 inches.</p> | <p>Door sign and wall sign shall be 60" above the floor.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p. 263</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p. 263</p> <p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195</p> <p>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA-ACRM 1115B.9.2 and CA-ACRM 1115B.9.1.2, ADA 4.19.6) p. 269</p> <p>Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA-ACRM 1115B.9.3) pp. 275, 269</p> |
|--|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

|  |  |                                                                                    |
|--|--|------------------------------------------------------------------------------------|
|  |  | Toilet paper dispenser minimum height from floor is 19". (ADA 4.16.6) pp. 275, 269 |
|--|--|------------------------------------------------------------------------------------|

## B. Recommendation

There was an area in the lobby that had all PUB 13 brochures in all languages available displayed on a wall mount. This is great. Although, it is recommended that the brochure wall mount be lowered or placed near accessible counter to make these accessible to persons with a disability as they are currently not within reach for someone in a wheelchair.

**Facility Location:** 926 S. Forbes Street, Lakeport

| Facility Element | Findings                                                | Corrective Action                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|------------------|---------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Parking          | No "Unauthorized Parking" sign at parking lot entrance. | Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17" by 22" min. in size with lettering 1" min. high, stating: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner's expense. Towed vehicles may be reclaimed at _____ or by telephoning _____." (CA T24 1129B.5) p. 133 |
|                  | Van accessible parking space too short at 16 feet.      | Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p 135<br>Van access aisle shall be 18' x 8' minimum on passenger side. (CA T24 1129 B.4.1, ADA 4.6.3) p. 135                                                                                                                                                                                                                                                                                                                             |
|                  | Accessible parking space too short at 16 feet.          | Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p. 135                                                                                                                                                                                                                                                                                                                                                                                                                                   |

|                   |                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                   | The words "NO PARKING" are not painted in access aisles.                                                                                                                                     | Access aisle shall be 18' x 5' minimum for cars. (CA T24 1129B.4.1 & 2, ADA 4.6.3) p. 135<br>The words "NO PARKING" shall be painted on the ground in each 5' or 8' loading and unloading access aisle in white letters no smaller than 12". (CA T24 1129B.4.1 & 2) p. 135                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Exterior entrance | <p>Railings leading to building's entrance too short at 33 inches.</p> <p>Force to open door at main entrance excessive at 10 lbs.</p> <p>ISA sign on door not placed in a visible area.</p> | <p>Handrail is mounted 34" to 38" above ramp. (CA T24 1133B.5.5.1, ADA 4.8.5(5))</p> <p>Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) &amp; (b)) p. 195</p> <p>A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.8.1.2) pp. 183, 353</p> <p>Characters, symbols and their backgrounds have a non-glare finish. Characters and symbols contrast with their background, either light characters on a dark background or dark characters on a light background. (CA T24 1117B.5.2, ADA 4.30.5) p. 355</p> |
| Restroom          | <p><b>Unisex Restroom #2:</b></p> <p>Door signage too low at 56 inches.</p>                                                                                                                  | Door sign and wall sign shall be 60" above the floor.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

|  |                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|--|------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  |                                                                              | <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p. 263</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p. 263</p> |
|  | Toilet tissue dispenser too far from front edge of toilet seat at 17 inches. | <p>Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA-ACRM 1115B.9.3) pp. 275, 269</p> <p>Toilet paper dispenser minimum height from floor is 19" (ADA 4.16.6) pp. 275, 269</p>                                                                                                                                                                                                                                          |
|  | No knee clearance under sink.                                                | <p>A minimum knee clearance of 27" high, 30" wide, and 19" deep is provided underneath sinks. (ADA 4.24.3) p. 311</p>                                                                                                                                                                                                                                                                                                                                                |

## B. Recommendation

There are two unisex restrooms in the lobby. The first restroom on the right has a water heater inside that does not allow adequate turning space for someone in a wheelchair. It is recommended that the second restroom to the left be designated as accessible as it has adequate turnaround space. If this restroom is designated as accessible it needs to be identified as accessible with the appropriate ISA sign placed on the door as well as on the wall. Please see corrective action for door and wall signage above.

The ISA sign at the main entrance was not placed in a visible area on the door. Sign was placed on the inside of the door but since the doors are tinted the sign was not clearly visible. It is recommended that the sign be placed outside on the door in a clearly visible area.



**Facility Location:** 9055 Highway 53, Lower Lake

| Facility Element | Findings                                                                     | Corrective Action                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|------------------|------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Parking          | No "Unauthorized Parking" sign at entrance to off-street accessible parking. | Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17" by 22" min. in size with lettering 1" min. high, stating: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner's expense. Towed vehicles may be reclaimed at _____ or by telephoning _____." (CA T24 1129B.5) p. 133 |
|                  | No accessible parking.                                                       | Accessible parking spaces shall be located as near as practical to a primary entrance and shall have required spaces according to (CA T24 1129B.1, ADA 4.1.2(5)(a)) p. 132                                                                                                                                                                                                                                                                                                                                               |
|                  | No van-accessible parking.                                                   | One in every 8 <b>accessible</b> spaces (no less than 1) shall be designated van accessible. (CA T24 1129B.4.2, ADA 4.1.2(5)(b)) pp. 135, 136                                                                                                                                                                                                                                                                                                                                                                            |
|                  |                                                                              | Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p. 135<br><br>Van access aisle shall be 18' x 8' minimum on passenger side. (CA T24 1129 B.4.1, ADA 4.6.3) p. 135                                                                                                                                                                                                                                                                                                                        |

|                   |                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                   | <p>No freestanding or wall mounted sign.</p> <p>The words "NO PARKING" are not painted in access aisle.</p>                                        | <p>One in every 8 accessible spaces (p 136) and no less than 1 shall be served by an access aisle 96" wide minimum placed opposite the driver's side and shall be designated Van-Accessible (CA T24 1129.B.4.2, ADA 4.1.2(5)(b)) p. 135</p> <p>Van-accessible spaces shall have a sign "Van-Accessible" mounted below the symbol of accessibility. Such signs shall be located so they cannot be obscured by a vehicle parked in the space. (CA T24 1129B.5, ADA 4.6.4) p. 133</p> <p>The words "NO PARKING" shall be painted on the ground in each 5' or 8' loading and unloading access aisle in white letters no smaller than 12". (CA T24 1129B.4.1 &amp; 2) p. 135</p> |
| Exterior entrance | <p>No International Symbol of Accessibility (ISA) at building's main entrance.</p> <p>Force to open door at main entrance excessive at 14 lbs.</p> | <p>A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.8.1.2) pp. 183, 353</p> <p>Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) &amp; (b)) p. 195</p>                                                                                                                                                                                                                                                                                         |

|          |                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Restroom | <p><b>In lobby at Main Entrance #1:</b></p> <p><b>Men's</b><br/>No accessible signage on the door adjacent to latch side of door.</p> <p><b>Women's</b><br/>No accessible signage on the door adjacent to latch side of door.</p> | <p>Door sign and wall sign shall be 60" above the floor.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p. 263</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p. 263</p> <p>Door sign and wall sign shall be 60" above the floor.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p. 263</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p. 263</p> |
|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

|  |                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|--|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | <p>Toilet tissue dispenser too far from front edge of toilet seat at 17 inches.</p> <p><b>Unisex restroom on TANF/CalWORKs Entrance #2:</b></p> <p>No accessible signage on wall adjacent to latch side of door.</p> <p>Toilet protector dispenser too high at 44 inches.<br/>Mirror base too high at 41 inches.</p> <p>Paper towel dispenser too high at 56 inches.</p> | <p>Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA-ACRM 1115B.9.3) pp 275, 269</p> <p>Toilet paper dispenser minimum height from floor is 19". (ADA 4.16.6) pp 275, 269</p> <p>Door sign and wall sign shall be 60" above the floor.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p 263</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p 263</p> <p>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA-ACRM 1115B.9.2 and CA-ACRM 1115B.9.1.2, ADA 4.19.6) p. 269</p> |
|--|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## B. Recommendation

There was no accessible or van-accessible parking space. It is recommended that the two parking spots closest to the end of the walkway be designated as accessible and van-accessible. Please see illustration, attachment A.

**Facility Location:** 16170 C Main Street, Lower Lake

| Facility Element  | Findings                                                                    | Corrective Action                                                                                                                                                                                                                               |
|-------------------|-----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Exterior entrance | No International Symbol of Accessibility (ISA) at building's main entrance. | A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.8.1.2) pp. 183, 353 |
|                   | Force to open door at main entrance excessive at 12 lbs of pressure.        | Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195                                                                                                                              |

## B. Recommendation

Note: Client parking is located on the street and since this is city parking it is not within CRB's jurisdiction, therefore parking was not reviewed.

## V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action (NOA) be in the individuals' primary language.

**A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews**

| Question                                                                                                                                         | Yes | No | Some-times | Comments                                                                                                                                                               |
|--------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Does the county identify a client's language need upon first contact? How?                                                                       | X   |    |            | Workers use the Language Preference Accommodation form, LAK 1220.                                                                                                      |
| Does the county use a primary language form?                                                                                                     | X   |    |            | Language Preference Accommodation, LAK 1220.                                                                                                                           |
| Does the client self-declare on this form?                                                                                                       | X   |    |            | Client fills out the Language Preference Accommodation form, LAK 1220.                                                                                                 |
| Are non-English- or limited- English-speaking clients provided bilingual services?                                                               | X   |    |            | Bilingual staff, if available, will be used to interpret. Bilingual services are also provided using Language Line.                                                    |
| After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter? | X   |    |            | Clients who are non-English or limited-English speaking are assigned a bilingual worker and if staff is unavailable an interpreter will be provided via Language Line. |
| Is there a delay in providing services?                                                                                                          |     | X  |            |                                                                                                                                                                        |

| Question                                                                                                          | Yes | No | Some-times | Comments                                                                                                                                                            |
|-------------------------------------------------------------------------------------------------------------------|-----|----|------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Does the county have a language line provider, a county interpreter list, or any other interpreter process?       | X   |    |            | The county uses bilingual staff, Language Line for telephone interpretation, and will contact neighboring counties such as Yuba and Mendocino for ASL interpreters. |
| Are county interpreters determined to be competent?                                                               | X   |    |            |                                                                                                                                                                     |
| Does the county have adequate interpreter services?                                                               | X   |    |            | County will use bilingual staff or Language Line.                                                                                                                   |
| Does the county allow minors to be interpreters? If so, under what circumstances?                                 | X   |    |            | Only under extenuating circumstances, such as to reschedule an appointment.                                                                                         |
| Does the county allow the client to provide his or her own interpreter?                                           | X   |    |            | If clients provide their own interpreter they are required to sign a perjury form, LAK 540, Release of Authorization.                                               |
| Does the county ensure that the client-provided interpreter understands what is being interpreted for the client? | X   |    |            | If worker feels like the client-provided interpreter is not competent, worker will arrange for an interpreter to ensure that the client understands.                |
| Does the county use the CDSS-translated forms in the clients' primary languages?                                  | X   |    |            |                                                                                                                                                                     |
| Is the information that is to be inserted into NOA translated into the client's primary language?                 | X   |    |            | Insertions in the NOAs are translated into the client's primary language.                                                                                           |

| Question                                                                                                                                                                                                                                                 | Yes | No | Some-times | Comments                                                                                                                                                                                                    |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)? | X   |    |            | The county has the PUB 13 available in Braille, Large Print and audio. Workers can also access TDD or contact an ASL interpreter. If the client has a visual impairment workers can use a magnifying glass. |
| Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?                                                                                                                                       | X   |    |            | If needed and requested, workers can read out loud to the client if the client has a hearing impairment or cannot read.                                                                                     |
| Does the county offer screening for learning disabilities?                                                                                                                                                                                               | X   |    |            |                                                                                                                                                                                                             |
| Is there an established process for offering screening?                                                                                                                                                                                                  | X   |    |            |                                                                                                                                                                                                             |
| Is the client identified as having a learning disability referred for evaluation?                                                                                                                                                                        | X   |    |            |                                                                                                                                                                                                             |

## B. Corrective Actions

None

## VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.



### A. Findings from Case File Reviews and Staff Interviews

| <b>Documented Item</b>                                                             | <b>Adult Programs</b>      | <b>Children's Services</b> | <b>CalWORKs</b>            | <b>Non-Assisted Food Stamps</b>             |
|------------------------------------------------------------------------------------|----------------------------|----------------------------|----------------------------|---------------------------------------------|
| Ethnic origin documentation                                                        | LAK 1166 E and SOC 295     | CWS-CMS ID page            | SAWS application           | Language Preference Accommodation, LAK 1220 |
| Primary language documentation                                                     | LAK 1166 E and SOC 295     | CWS-CMS ID page            | SAWS application           | Language Preference Accommodation, LAK 1220 |
| Method of providing bilingual services and documentation                           | None found in sample cases | CWS-CMS ID page            | Noted in case comments     | Language Preference Accommodation, LAK 1220 |
| Client provided own interpreter                                                    | None found in sample cases | None found in sample cases | Noted in case comments     | Case comments                               |
| Method to inform client of potential problem using own interpreter                 | None found in sample cases | None found in sample cases | None found in sample cases | Case comments                               |
| Release of information to Interpreter                                              | None found in sample cases | None found in sample cases | None found in sample cases | Case comments                               |
| Individual's acceptance or refusal of written material offered in primary language | None found in sample cases | None found in sample cases | None found in sample cases | Case comments                               |
| Documentation of minor used as interpreter                                         | None found in sample cases | None found in sample cases | None found in sample cases | Case comments                               |
| Documentation of circumstances for using minor interpreter temporarily             | None found in sample cases | None found in sample cases | None found in sample cases | Case comments                               |
| Translated notice of actions (NOA) contain translated inserts                      | Case file                  | None found in sample cases | Case file                  | Case comments                               |

| <b>Documented Item</b>                                                   | <b>Adult Programs</b>                                      | <b>Children's Services</b> | <b>CalWORKs</b>                 | <b>Non-Assisted Food Stamps</b> |
|--------------------------------------------------------------------------|------------------------------------------------------------|----------------------------|---------------------------------|---------------------------------|
| Method of identifying client's disability                                | Noted on case narrative and on LAK 261, Reassessment Sheet | CWS-CMS ID page            | Documented on information sheet | Statement of Facts and LAK 1220 |
| Method of documenting a client's request for auxiliary aids and services | Noted on case narrative and on LAK 261, Reassessment Sheet | CWS-CMS ID page            | Documented on information sheet | Statement of Facts and LAK 1220 |

## **B. Corrective Actions**

| <b>Areas of Action</b>                                             | <b>Corrective Action</b>                                                                                                                                                                                                                                                                                                                                                                 |
|--------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Documentation if client provided own interpreter                   | When applicants/recipients provide their own interpreter, the CWD shall ensure that the applicants/recipients are informed of the potential problems for ineffective communication. The CWD shall document in the case record that the applicants/recipients were so informed.<br>Div. 21-116.23                                                                                         |
| Temporary use of a minor (under 18 years of age) as an interpreter | When a minor (under 18 years of age) is used as an interpreter, the CWD shall so document the circumstances requiring <u>temporary</u> use of minors in the case record.<br><br>Div. 21-116.22<br>Only under extenuating circumstances or at the specific request of the applicant/recipient shall a CWD allow a minor (under the age of 18 years) to temporarily act as an interpreter. |
| Documentation of interpreter signed confidentiality statement      | Consent for the release of information shall be obtained from applicants/recipients when individuals other than CWD employees are used as interpreters and the case record shall be so documented.<br>Div. 21-116.24                                                                                                                                                                     |
| Documentation of primary language                                  | Each agency shall ensure that case record identification shows the applicant's/recipient's ethnic origin and primary language.<br>Div. 21-201.21                                                                                                                                                                                                                                         |

| Areas of Action                                     | Corrective Action                                                                                                                                                                                                            |
|-----------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Documentation that bilingual services were provided | Document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter.<br>Div. 21-116.22 |

### C. Recommendation

When reviewing the case files, it was noted that the Employment Services office does not use and was not aware of the "primary language accommodation" form, LAK 1220. It is recommended that staff be reminded of the forms available and the need to document if bilingual services were requested and provided in the clients primary language.

## VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

### A. Findings

| Interview questions                                                                                                     | Yes | No | Some-times | Comments                                                                                                                                                       |
|-------------------------------------------------------------------------------------------------------------------------|-----|----|------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Do employees receive continued Division 21 Training?                                                                    | X   |    |            | Division 21 training is provided on a yearly basis. There were a few staff in the Arbor Education and Training office that were not familiar with Division 21. |
| Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint? | X   |    |            | Most of the staff interviewed were aware of what the procedure is to file a discrimination complaint.                                                          |
| Does the county provide employees Cultural Awareness Training?                                                          | X   |    |            | Cultural awareness training is provided on a yearly basis.                                                                                                     |

|                                                                                                             |   |   |  |                                                                                                                                            |
|-------------------------------------------------------------------------------------------------------------|---|---|--|--------------------------------------------------------------------------------------------------------------------------------------------|
| Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?                                    |   | X |  | MEPA training has not been provided to CSW's.                                                                                              |
| Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area? | X |   |  | Employees are aware of the predominant cultural groups and also receive training on the Indian Child Welfare Act (ICWA) on a yearly basis. |

### **B. Corrective Actions**

| <b>Training Area</b>                        | <b>Corrective Action</b>                                                                                                                                                                                                                                                                          |
|---------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Division 21, Civil Rights Training          | Lake County shall ensure that employees receive Division 21 civil rights training at the time of orientation, as well as ongoing training to ensure that public contact staff has knowledge of Division 21, including familiarization with the discrimination complaint process.<br>Div. 21-117.1 |
| MEPA Training for Children's Social Workers | Lake County shall ensure that CSW's receive MEPA training to ensure that public contact staff has knowledge of, and properly apply the placement prohibitions contained in MEPA.<br>42 U.S.C. 672, 674, and 1996(b)                                                                               |

### **C. Recommendation**

None

## **VIII. DISCRIMINATION COMPLAINT PROCEDURES**

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

### A. Findings from Staff Interviews and Program Manager Surveys

| Interview and review areas                                                                                                    | Yes | No | Some-times | Findings                                                                                                     |
|-------------------------------------------------------------------------------------------------------------------------------|-----|----|------------|--------------------------------------------------------------------------------------------------------------|
| Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?                | X   |    |            | Most of the staff interviewed were able to differentiate a civil rights, program and personnel complaint.    |
| Did the employees know who the Civil Rights Coordinator is?                                                                   | X   |    |            | All employees are aware that John Moore is the civil rights coordinator.                                     |
| Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint? | X   |    |            | All employees are aware of the location of the PUB 86, which includes the contact information for Mr. Moore. |
| When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?                           | X   |    |            |                                                                                                              |

### B. Corrective Action

| Element                | Corrective Action                                                                                                                                                                |
|------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Discrimination Process | Lake County shall ensure staff have knowledge of the discrimination complaint process and are able to differentiate it from other complaint processes.<br>Div. 21-117 and 21-203 |

### C. Recommendation

None

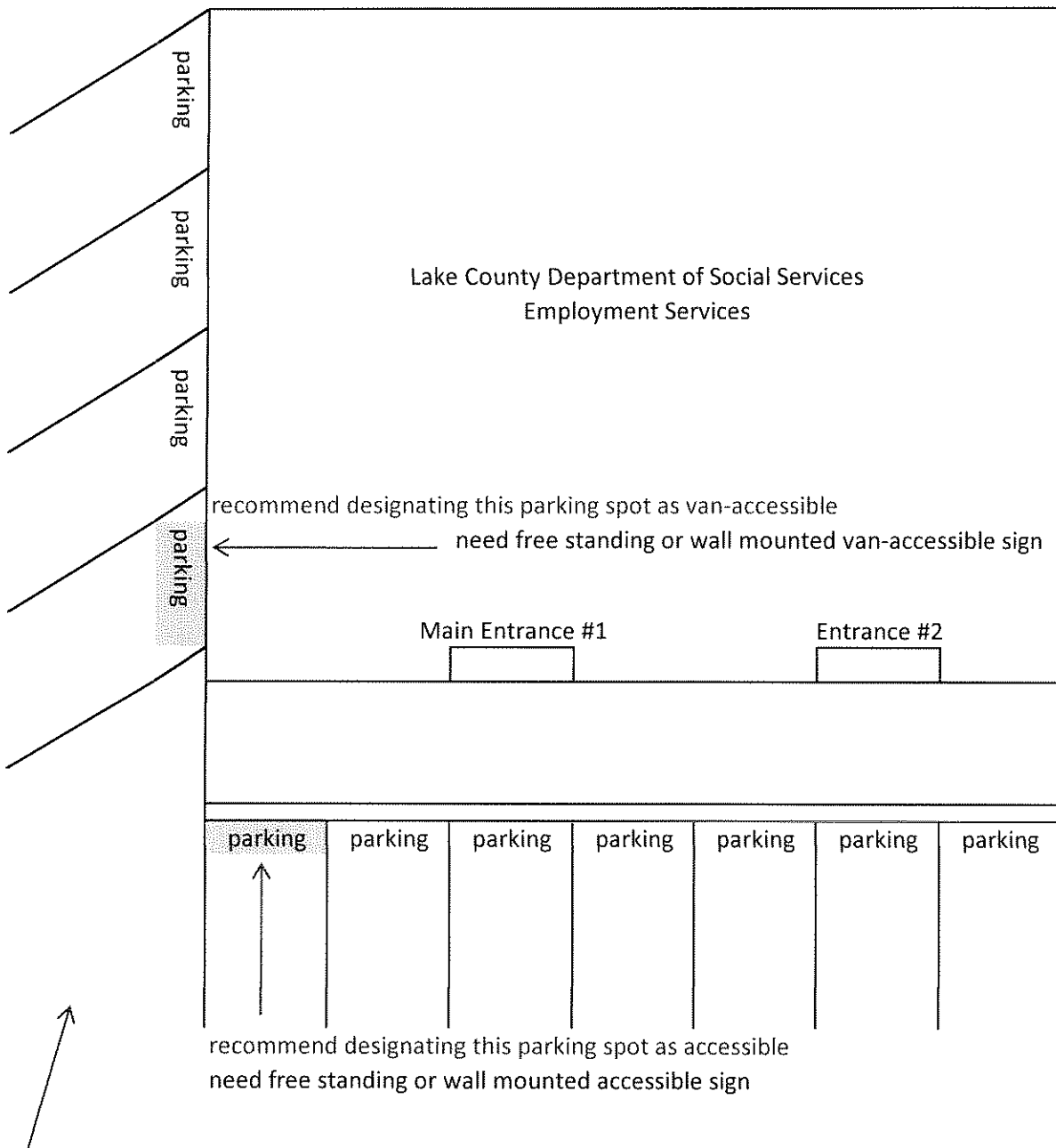
## **IX. CONCLUSION**

The CDSS found the Lake County Department of Social Services in substantial compliance with CDSS Division 21 Regulations, and other applicable state and federal laws with some exceptions. The CDSS would like to acknowledge and thank Ms. Sandra Young, Civil Rights Coordinator, for her assistance, cooperation and coordination of the review. The Lake County Department of Social Services staff interviewed was found to be professional, pleasant and committed to providing outstanding service to their clients.

Lake County must remedy the deficiencies identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule by which all actions will be taken to correct the deficiencies.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance deficiencies and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.

Attachment A



the words "NO PARKING" need to be painted in access aisle